

AO 91 (Rev 5/85) Criminal Coi .int

United States District Court

Northern

DISTRICT OF

New York

U. S. DISTRICT COURT
N. D. OF N. Y.

FILED

UNITED STATES OF AMERICA

APR 22 1996

V.

AT 9 O'CLOCK M.
JESSIE A. RAY, Clerk
U.S.D.C.

CRIMINAL COMPLAINT

Name: Sang Hyun KIM
Address: 31-19 74th Street
Jackson Heights, N.Y.
Birthdate: 12/10/65
(Name and Address of Defendant)

CASE NUMBER: 96-MG-190

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about April 20, 1996 in Clinton county, in the

Northern District of New York defendant(s) did, (Track Statutory Language of Offense) knowingly and in reckless disregard of the fact that the following named alien Gi Hee KIM had not received prior official authorization to come to, enter, or reside in the United States, did bring or attempt to bring said alien to the United States by means of transportation, to wit; an automobile, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324(a)(2)(A)

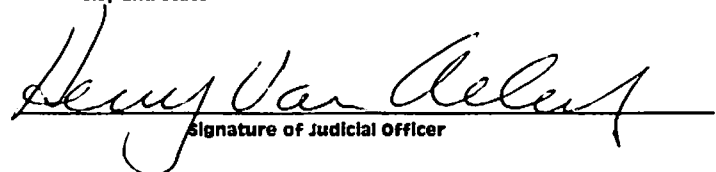
I further state that I am a(n) Special Agent and that this complaint is based on the following

facts: that on or about April 19, 1996 the defendant drove from New York City to Toronto, Ontario, Canada where he picked up four individuals Gi Hee KIM, Ja Ung GU, Sun Suk KIM and Um Sok KIM. The defendant then drove the aforementioned Subjects to a point on the Canadian side of the border near Mooers, New York. The aforementioned Subjects exited the vehicle and entered the United States afoot without inspection. The defendant attempted to enter the United States through the open port of entry at Champlain, New York, upon

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

 Signature of Complainant

Sworn to before me and subscribed in my presence.

 22 April 1996 at Rouses Point, New York
 Date City and State
Henry Van Acker, Jr., U.S. Magistrate Judge
Name & Title of Judicial Officer

 Signature of Judicial Officer

which time his vehicle was impounded by the New York State Police for driving with a suspended license. The defendant later hired a local person for \$250.00 to drive him to the location where the aforementioned Subjects were waiting to be picked up once again. The Subjects were picked up and driven to a local motel. Later, the Border Patrol Office in Champlain, New York received an anonymous phone call in regards to the aforementioned Subjects. Border Patrol Agent Dennis Doody responded to the information and found Gi Hee KIM, who is an undocumented alien from Korea and the defendant, a resident alien (I-551) and citizen of Korea at the motel.

Rm. G